

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

CENTRA'S MOTION TO DISMISS DR. OLDHAM'S AMENDED COMPLAINT

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant Centra Health Inc. (“Centra”) moves the Court to dismiss with prejudice the Amended Complaint (Doc. 19) filed by Plaintiff Dwight Oldham (“Dr. Oldham”). As set forth in Centra’s Memorandum in Support of its Motion to Dismiss, Dr. Oldham’s Amended Complaint fails to state a claim on which relief can be granted and should be dismissed with prejudice.

Centra respectfully requests that the Court: (1) dismiss Dr. Oldham's Amended Complaint with prejudice; and (2) award Centra such additional and further relief as the Court deems just and proper.

Dated: October 8, 2020

Respectfully submitted,

CENTRA HEALTH, INC.

By: /s/ Joshua F. P. Long
Of Counsel

Elizabeth Guilbert Perrow, Esq. (VSB No. 42820)
J. Benjamin Rottenborn (VSB No. 84796)
Joshua F. P. Long, Esq. (VSB No. 65684)
Joshua R. Treece, Esq. (VSB No. 79149)
J. Walton Milam III, Esq. (VSB No. 89406)
WOODS ROGERS PLC
P. O. Box 14125
Roanoke, VA 24038-4125
Phone: (540) 983-7600

Fax: (540) 983-7711
eperrow@woodsrogers.com
brottenborn@woodsrogers.com
jlong@woodsrogers.com
jtreece@woodsrogers.com
wmilam@woodsrogers.com

Counsel for Defendant Centra Health, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notice to all counsel of record.

/s/ Joshua F. P. Long